

Memorandum

To : Honorable Ronald Robie, Director
Department of Water Resources
1416 Ninth Street
Sacramento, CA 95814

Attention: Mr. Ken Fellows

Date : September 29, 1975

Subject: San Mateo County
Mid-Coastside Project -
Half Moon Bay
San Mateo County
SCH. No. 75090824

From : **Air Resources Board**

William C. Lockett, Chief
Evaluation and Planning

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Office of Planning &
Research

The subject wastewater management study area covers three principal communities in San Mateo County; the City of Half Moon Bay and the unincorporated areas of El Granada and Montara-Moss Beach. Seven design alternatives were considered. "Plan A" has been selected as the most appropriate design for the purposes of impact analysis and initial review by state and federal funding agencies. Briefly, "Plan A" provides for collection and treatment of wastewater at the three plant locations with common ocean disposal in Half Moon Bay.

Upgrading treatment and outfall relocations, in order to make use of the existing design capacity of 1.8 mgd, are the major purposes of the proposed project. However, as stated on page 13 of the EIR, the existing needs in the study area are about 0.8 mgd (1974 population of 11,700). The EIR also recognizes on page 31 that the project's capacity could serve a population of 28,500 and therefore represent a substantial growth potential for the area which is nearly twice the 1996 E-zero growth projection.

This project is in a critical air area. Therefore, decision makers need to be aware that state and federal funding will probably be limited to E-zero growth projections. Also, decision makers should be aware that because of state and federal regulations now being developed, the anticipated growth provided for in this project may not be possible. Therefore, providing capacity in excess of future needs may require local residents to bear a greater tax burden than presently anticipated since the expected growth may not materialize.

The plan study area is located in an air quality maintenance area (AQMA). In the next two years the ARB in cooperation with local government will participate in the development of an air quality maintenance plan (AQMP) for those areas. An AQMA is an area in which growth and development are projected to prevent either the attainment or, if attained, the maintenance of the national ambient air quality standards in the next ten years.

In addition, the decision makers need to take cognizance of a statement by Frank M. Covington of EPA, dated June 20, 1974, concerning

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the Clean Water Grant Program. The ARB understands this statement to indicate that all applicants for federal clean water funds need to demonstrate that the attainment and maintenance of air quality standards will not be hampered by a proposed project. This demonstration needs to be presented in the subject EIR through the implementation of sufficient mitigation measures.

Adequate demonstration is needed on consistency of growth provided in this project with the attainment and maintenance of air quality standards. Without such a demonstration the project needs to meet an appropriate condition to limit detrimental air quality impacts until there is assurance the utilization of such capacity will not interfere with the attainment and maintenance of standards.

cc: S. Prindiville, EPA
L. Walker, SWRCB